

BakerHostetler

Baker&Hostetler LLP

45 Rockefeller Plaza
New York, NY 10111

T 212.589.4200
F 212.589.4201
www.bakerlaw.com

John W. Moscow
direct dial: 212.589.4636
jmoscow@bakerlaw.com

November 6, 2015

VIA ECF

The Honorable Thomas P. Griesa
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: United States v. Prevezon Holdings, Ltd., et al., Case No. 13-Civ-6326 (TPG).

Dear Judge Griesa:

I understand that the Government has sent you selected correspondence with one or more unnamed people, William Browder or people working with him, as a way of letting you determine whether they have established a claim of privilege as to those documents. To accede to that course would be an error. When documents are submitted to a Court for *in camera* review it is all the documents, not the withholding party's choice of documents, which get produced. To allow the Government to decide which documents should constitute an *in camera* submission makes a mockery of the Court's review. If the Government wants to withhold documents from the Defendants, for the Court to examine, then the Court, not the Government, should examine them.

The Government needs to send you all the documents. They also need to send us a privilege log by which we can ascertain what the claims of privilege are. At the moment the privilege log

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does not identify anything about the documents, nor does it specify what purported privilege is being asserted.

Without that the claim of privilege should be denied.

Respectfully Submitted,



John W. Moscow

cc: AUSA Paul Monteleoni
AUSA AUSA Jaimie Nawaday
AUSA Margaret Graham

Seth T. Taube
Mark Cymrot